

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

|                           |   |                           |
|---------------------------|---|---------------------------|
| IN RE:                    | § |                           |
|                           | § | Case No. 22-60043         |
| FREE SPEECH SYSTEMS, LLC, | § |                           |
|                           | § | Chapter 11 (Subchapter V) |
| Debtor                    | § |                           |

**CONNECTICUT PLAINTIFFS'  
WITNESS AND EXHIBIT LIST**

|                      |   |
|----------------------|---|
| Judge                | Hon. Christopher M. Lopez   |
| Hearing Date         | Tuesday, February 14, 2023  |
| Hearing Time         | 1:00 p.m. (CST)   |
| Party's Name         | Connecticut Plaintiffs  |
| Attorney's Names     | Ryan Chapple, Alinor Sterling, Kyle Kimpler, Christopher Hopkins, and Martin Salvucci                         |
| Attorney's Phone     | 512-477-5000 (Ryan Chapple)   |
| Nature of Proceeding | Debtor's Emergency Motion to Approve Assumption of Commercial Real Property Lease with BCC UBC LLC [Dkt. 412] |

David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the Connecticut Plaintiffs) hereby submit this Witness and Exhibit List in connection with the hearing on *Debtor's Emergency Motion to Approve Assumption of Commercial Real Property Lease with BCC UBC LLC* (the Lease Motion) [Dkt. 412] to be held on Tuesday, February 14, 2023 at 1:00 p.m. (Central Standard Time):

The Connecticut Plaintiffs reserve the right to supplement, amend, or revise this Witness and Exhibit List at any time prior to the hearing. The Connecticut Plaintiffs reserve the right to supplement the Witness and Exhibit List with new witnesses and additional exhibits. Further, the Connecticut Plaintiffs reserve the right to use any

exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Connecticut Plaintiffs further reserve the right to introduce exhibits previously admitted.

### **WITNESS LIST**

The Connecticut Plaintiffs may call the following witnesses at the hearing:

1. Patrick Magill, Chief Restructuring Officer of Debtor;
2. Any witness necessary to rebut the testimony of any witness called or designated by any other parties;
3. Any witness listed or called by any other party.

### **EXHIBIT LIST**

The Connecticut Plaintiffs may offer for admission into evidence any of the following exhibits at the hearing:

| <b>No.</b> | <b>Description</b>  | <b>Offered</b> | <b>Objection</b> | <b>Admitted/<br/>Not<br/>Admitted</b> | <b>Disposition</b> |
|------------|---|----------------|------------------|---------------------------------------|--------------------|
| 1.         | Transcript for hearing held December 19, 2022                   |                |                  |                                       |                    |
|            | Any document or pleading filed in the above-captioned case      |                |                  |                                       |                    |
|            | Any exhibits identified or offered by any other party           |                |                  |                                       |                    |
|            | Any exhibits necessary for impeachment and/or rebuttal purposes |                |                  |                                       |                    |

Respectfully submitted this 13th day of February 2023.

**CAIN & SKARNULIS PLLC**

By: /s/ Ryan E. Chapple

Ryan E. Chapple

State Bar No. 24036354

303 Colorado Street, Suite 2850

Austin, TX 78701

Telephone: (512) 477-5000

Fax: (512) 477-5011

E-mail: [rchapple@cstrial.com](mailto:rchapple@cstrial.com)

**KOSKOFF KOSKOFF & BIEDER PC**

Alinor C. Sterling (admitted *pro hac vice*)

350 Fairfield Avenue

Bridgeport, CT 06604

Telephone: (203) 336-4421

E-mail: [asterling@koskoff.com](mailto:asterling@koskoff.com)

**PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP**

Kyle J. Kimpler (admitted *pro hac vice*)

Christopher Hopkins (*pro hac vice* pending)

Martin J. Salvucci (admitted *pro hac vice*)

1285 Avenue of the Americas

New York, NY 10019

Telephone: (212) 373-3000

Fax: (212) 757-3990

E-mail: [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com)

E-mail: [chopkins@paulweiss.com](mailto:chopkins@paulweiss.com)

E-mail: [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com)

***Co-Counsel to the Connecticut Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for Debtor, Debtor, and all parties receiving or entitled to notice through CM/ECF on this 13th day of February 2023.

/s/ Ryan E. Chapple

Ryan E. Chapple